

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

In re:

**AMERICAN BERBER, INC.,

Debtor.**

**AMERICAN BERBER, INC.,

Plaintiff,**

v.

**POLYMER SOLUTIONS GROUP
FINANCE, LLC d/b/a PHOENIX
CHEMICAL COMPANY, and JB PCC,
INC. f/k/a PHOENIX CHEMICAL
COMPANY, INC.,**

Defendant.

CHAPTER 11

CASE NO. 19-41154-bem

ADVERSARY PROCEEDING

NO. 22-04002-bem

REPORT OF RULE 26(f) CONFERENCE AND REQUEST FOR SCHEDULING ORDER

On April 27, 2022, the above-referenced parties, through their respective undersigned counsel, conferred for the purposes prescribed by Fed. R. Civ. P. 26(f), made applicable to this proceeding by Fed. R. Bankr. P. 7026. The parties discussed their respective discovery plans and now submit the following for the Scheduling Order:

1. **Initial Disclosures.** The parties agree to exchange written initial disclosures.
2. **Discovery Plan.** The parties jointly propose to the Court that discovery shall be completed by July 29, 2022, subject to modification by the Court with the consent of the parties or for good cause shown.
3. **Other Items.**

- (a) The parties shall submit a consolidated pretrial order no later than 30 days after the close of discovery or after the entry of an order on dispositive motions, whichever is later. *See* Bankruptcy Local Rule 7016-2.
- (b) Unless further ordered by the Court, Plaintiff will be allowed until August 15, 2022, to file motions to join additional parties and until August 15, 2022 to file motions to amend the pleadings.
- (c) Unless further ordered by the Court, Defendant will be allowed until August 15, 2022, to file motions to join additional parties and until August 15, 2022 to file motions to amend the pleadings.
- (d) All dispositive motions, including Motions for Summary Judgment, will be filed 30 days after the close of discovery.

4. Settlement Potential.

- (a) The parties have discussed settlement.
 - (b) The parties do intend to hold additional settlement conferences among themselves prior to the close of discovery
 - (c) The parties have considered alternative dispute resolution.
5. Identify any other matters regarding this Court's authority or jurisdiction, discovery or case management that may require the Court's attention (e.g., concerns about confidentiality; the need for protective orders; unmovable scheduling conflicts): **The Parties consents to this Court entering a final judgment.**
6. Any other matters not covered above. **None.**
7. The parties do not request a conference with the Court prior to entry of the scheduling order.

WHEREFORE, the parties submit this Report of their Rule 26(f) conference.

Respectfully submitted this 28th day of April, 2022.

JONES & WALDEN LLC

/s/ Thomas T. McClendon

Thomas T. McClendon

Georgia Bar No. 431452

Attorneys for Plaintiff

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/s/ Nathaniel T. DeLoatch (by TTM with express
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Attorneys for Defendants

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

In re:

**AMERICAN BERBER, INC.,

Debtor.**

**AMERICAN BERBER, INC.,

Plaintiff,**

v.

**LAWSON ELECTRIC COMPANY, INC.,

Defendant.**

CHAPTER 11

CASE NO. 19-41154-bem

ADVERSARY PROCEEDING

NO. 22-04003-bem

CERTIFICATE OF SERVICE

I hereby certify that on the date indicated below, the foregoing *Report of Rule 26(f) Conference and Request for Scheduling Order* (the "Report") was electronically filed using the Bankruptcy Court's Electronic Case Filing program, which sends a notice of and an accompanying link to the Report to the following parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing Program:

- **Nathaniel T. DeLoatch** nathan.deloatch@troutman.com

This 28th day of April, 2022.

JONES & WALDEN LLC

/s/ Thomas T. McClendon

Thomas T. McClendon

Georgia Bar No. 431452

Attorneys for Plaintiff

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